

Response to Regional Board Staff Comments on the
DRAFT IMPLEMENTATION PLAN
MARINA DEL REY HARBOR MOTHERS' BEACH
AND BACK BASINS BACTERIA TMDL

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CALIFORNIA REGIONAL WATER
QUALITY CONTROL BOARD
LOS ANGELES REGION

Comment #	Document Reference	Comment Summary	Response
1	General Comment	In light of the size of the watershed and scale of the proposed projects, discuss in more detail why the maximum timeframe of 18 years is necessary to achieve compliance.	<p>The drainage area of Marina Del Rey has many characteristics that set it apart from the other, larger watersheds within the Santa Monica Bay. First, the Marina is the least similar to the TMDL reference watershed Arroyo Sequit. As a man-made, small-craft marina, poor circulation creates an almost closed system that is very different than the natural wave action along the open coast.</p> <p>The Marina also attracts and sustains wildlife habitation that can contribute large bacteria loads directly to its waters. Bacteria levels at compliance points could be influenced by this wildlife, especially during dry weather conditions.</p> <p>Other limitations of the Marina drainage area inhibit the application of structural solutions for wet-weather conditions. As explained in Section 4.4, these limitations include a high ground water table, dense residential and commercial development, sparse open space, very few publicly-owned parcels, and a natural low-lying topography with historical flooding.</p> <p>The duration of the implementation period was</p>

			determined to be necessary based on the limitations of the area and due to the extensive analysis needed for a possible regional treatment project. Most activities are scheduled to be initiated during the first two phases of the implementation period with the sub-regional and regional projects being completed near the end. See Section 4 for further details of the implementation schedule.
2	General Comment	Discuss in more detail how the draft I-Plan will achieve the TMDL compliance milestones (i.e. exceedance day reductions at the beach in the harbor).	The TMDL does not directly require the implementation plan to link proposed activities to a specific percent reduction in exceedance days. By committing to an iterative and adaptive implementation approach, it is expected that a suite of non-structural and institutional BMPs along with strategic structural solutions will gradually reduce exceedance days until numeric targets are met at the end of the implementation period. To provide a better understanding of the potential sub-regional structural projects, we have included fact sheets for each.
3	General Comment	The draft I-Plan should provide more tangible action items based on the institutional control options slated for consideration.	The responsible agencies are fully committed to meeting TMDL requirements through an iterative and adaptive approach. The consideration, evaluation, investigation, and assessment are all an active part of this approach. These preliminary review processes will require tasks that can only be identified during implementation. The need for flexibility is imperative so that the most appropriate follow-up actions can be implemented.

4	General Comment	<p>The draft I-Plan should provide more alternatives to the proposed regional control strategy for wet-weather compliance.</p>	<p>The implementation plan included a possible regional control strategy for wet-weather compliance if other implementation strategies fail to reduce bacteria exceedances as expected. It is recognized that because retrofits of this type are unique, there may be site-specific limitations with respect to right-of-way, engineering, permitting, and other constraints. Therefore, feasibility analyses for a regional solution, which was scheduled to be conducted in Stage II, will now be initiated in Phase I.</p> <p>It is conceivable that based on the feasibility study, the regional control strategy may be refined, replaced, or supplemented with additional regional measures. Based on our understanding of current information, the best opportunity for a regional solution is in the vicinity of Oxford Basin. During the feasibility study, alternative regional and sub-regional control strategies will be investigated.</p>
5	General Comment	<p>Include specific performance measures (i.e. implementation goals) as well as project level schedules for institutional program (Table 4.3) and local projects (Table 4.4).</p>	<p>Further details relating to performance measures and time schedules have been provided for institutional programs as well as local and regional BMP projects within Section 4. These details include specific milestones such as the completion of preliminary feasibility studies, design, permitting, and operation. Each program and project will be evaluated for effectiveness. Institutional programs will be evaluated using current techniques such as surveys, outreach impression estimates, and behavioral change</p>

			observations. Conclusions from these efforts will further refine implementation efforts so that waste load allocations can be achieved.
6	General Comment	The draft I-Plan should replace the requests for additional re-openers with periodic reports to the Regional Board on implementation progress, monitoring results and updates to the I-Plan.	Additional re-openers have been removed. Periodic reports to the Regional Board are recommended in Section 5.